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Via: ECF
Hon. Judge John G Koeltl
District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

June 2, 2022

Case No. 22-CV-03872

*Appellant's Brief due 7/28/22.
Appellee's Brief due 9/9/22.
Reply Brief due 9/23/22.
So ordered. 6/3/22 JGK/USDC*
Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc.,
Appellant v Deborah J. Piazza, Appellee.

Dear Judge Koeltl,

I am the counsel for the appellant, Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc. I am writing to request additional 45 days' time to file the supporting brief in this matter.

Your Honor, You had issued an order on or about May 16, 2022, setting a timeline for submission of briefs by respective parties, i.e. opening brief appellant by June 13, 2022 and appellees to respond by July 5, 2022. I am writing to request additional 45 days as the brief might not even be necessary. The appellant is a Church, that has been rendered homeless by a forced sale of its only prayer house by the bankruptcy trustee, the appellee. This has impacted the Church members negatively and there is growing discord between the members and this infighting has resulted in the stalemate with some members wanting to go ahead with the appeal and while others wants to start fresh and stop all litigation. The Pastor of the Church wants to drop the litigation completely. But the members of the Church feel otherwise. It is possible that the Church might not go ahead with the appeal. I want to help them to reach an agreement among each others' regarding whatever action they wish to take.

Further, Your Honor, I am traveling abroad starting June 3rd, 2022, until June 23, 2022. I really want to help the Church. Church does not have any money to retain any attorney. The Church is in a difficult position without a prayer house and or funds. Whatever funds that the Church had after payment of a disputed creditor, the trustee and her legal team took that as their legal fees.

Wherefore, I very respectfully request to grant the first motion of the Church to grant us additional 45 days to June 13, 2022, deadline. Thank you for your consideration.

Yours sincerely,

/s/karamvirdahiya

Karamvir Dahiya CC:

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